

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

AIG SPECIALTY INSURANCE	§	CIVIL ACTION NO. 6:21-CV-04191-RRS CBW
COMPANY (f/k/a CHARTIS	§	
SPECIALTY INSURANCE	§	JUDGE ROBERT R SUMMERHAYS
COMPANY)	§	
	§	
VS.	§	MAGISTRATE CAROL B WHITEHURST
	§	
KNIGHT OIL TOOLS, INC.	§	
	§	(ORAL ARGUMENT REQUESTED)
	§	(JURY REQUESTED)

**UNOPPOSED MOTION FOR LEAVE TO FILE COMBINED REPLY MEMORANDUM  
IN EXCESS OF PAGE LIMIT BY INTERVENOR RIPPY OIL COMPANY**

NOW INTO COURT, through undersigned counsel, comes Intervenor, RIPPY OIL  
COMPANY (“Rippy Oil”), who respectfully represents as follows:

**1.**

On December 7, 2021, AIG Specialty Insurance Company (“AIG”) filed its complaint for declaratory judgment against Knight Oil Tools, Inc. only. (“KOT”). [R. Doc. 1]. Defendant KOT filed a waiver of service [R. Doc. 14] followed by two unopposed Motions for Extension of Time to File an Answer or Other Responsive Pleading. [R. Doc. 30 and 34]. KOT filed a Motion to Dismiss for lack of Jurisdiction or in the alternative, Motion to Stay by Knight Energy Services, LLC, incorrectly named, Knight Oil Tools, Inc. on March 22, 2022. [R. Doc. 42].

**2.**

On January 18, 2022, this Honorable Court granted leave for Rippy Oil to intervene and file a motion to dismiss the complaint of plaintiff AIG Specialty Insurance Company (“AIG”). [R. Doc. 12.] That same day, Rippy Oil filed its Motion to Dismiss. [R. Doc. 13.] at the behest of AIG, Intervenor filed a Motion for Abstention and to Dismiss Complaint for Declaratory Judgment or in the alternative Stay or Transf4r. [R. Doc. 36] As one basis for its Motion to Dismiss, Rippy

Oil Company questions whether AIG has a live case or controversy with KOT that is ripe and therefore justiciable for declaratory relief determination. KOT likewise filed a Motion to Dismiss asserting no case or controversy between KOT and AIG as a basis for dismissal. [R. Doc. 42]

**3.**

On May 2, 2022, AIG filed a 29 page Joint Memorandum in Opposition to KOT's and Rippy Oil's Motion for Abstention and to Dismiss or in the alternative Stay or Transfer. [R. Doc. 63].

**4.**

On May 6, 2022, ACE American Insurance Company ("ACE") filed a 19 page Response to Rippy Oil's Motion to Dismiss. [R. Doc. 64.] Pursuant to the Court's Order, Rippy Oil's current deadline to file a Motion for Abstention and to Dismiss or in the alternative Stay or Transfer.

**5.**

In order to adequately reply to AIG's and ACE's Motions, Intervenor Rippy Oil seeks leave to file a 19 page combined Reply Memorandum (excluding cover page, Table of Contents, Index of Authorities, and Conclusion and Prayer) rather than two separate 10 page replies. A 19 page Reply Memorandum will be 9 pages in excess of Local Rule 7.8 page limitation.

**6.**

Pursuant to Local Rules 7.4.1 and 7.9, as evidenced by the certificate located at the end of this motion, Rippy Oil has obtained consent for the filing and granting of this motion from all parties having an interest to oppose.

**7.**

A copy of the proposed reply Memorandum is attached.

WHEREFORE, premises considered, Intervenor, RIPPY OIL COMPANY (“Rippy Oil”), prays that this unopposed motion be granted, and that Rippy Oil be granted leave to file a combined Reply Memorandum in response to AIG’s Response. [R. Doc. 63] and ACE’s Response [R. Doc. 64].

Respectfully submitted,

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**ATTORNEYS FOR INTERVENOR, RIPPY  
OIL COMPANY  
CERTIFICATE OF SERVICE**

I certify that on this 19th day of May, 2022, a true and correct copy of the foregoing instrument was served via electronic means through transmission facilities from the Court upon those parties authorized to participate and access the Electronic Filing System for the United States District Court, Western District of Louisiana.

/S/ James H. Gibson  
JAMES H. GIBSON

**LR 7.4.1 CERTIFICATE**

Pursuant to Local Rule 7.4.1, I hereby certify that I have obtained consent for the filing and granting of this motion from all parties having an interest to oppose.

/S/ Mike Morris  
MIKE MORRIS

**LR. 7.9 CERTIFICATE**

Pursuant to Local Rule 7.9, I hereby certify that there is no opposition to this request by plaintiff AIG Specialty Insurance Company.

/S/ Mike Morris  
MIKE MORRIS